Remarks/Arguments:

Claims 1-2, 4-8, and 10-18 remain in this application. Claims 3, 9, and 19 have been canceled. Claims 1, 4, 5, 7, and 12 are amended herein.

Claim 18 is allowed, and claims 12-17 have been determined to be allowable.

Claim 4-5, 10 and 12 were objected to because of various informalities. Such informalities have been removed by the amendments provided herein. As such, the Applicant respectfully requests that the objections be withdrawn.

Claims 1-2, 4-5, 7-8 and 10 were rejected as being unpatentable over *Saito* (EP 0989757) in view of *Foley et al.* (US 5510851, hereinafter *Foley*), and claims 6 and 11 as being unpatentable over *Saito* and *Foley* in view of *Yajima et al.* (US 6356277, hereinafter *Yajima*). The Applicant respectfully traverses because there is no teaching, suggestion, or motivation to combine the references, and the cited references do not, individually or in combination, teach, suggest, or motivate all of the recitations of any of the rejected claims.

In the response to the April 23, 2004 Office Action, the Applicant presented arguments as to why the rejections of claims 1-2, 4-8, and 10-11 should be withdrawn. However, the Current Office Action points out that the arguments presented relied on an assertion that gamma adjusted signals are used in adjusting chromaticity, but that the claims were not necessarily limited in that manner. In response, the Applicant has amended claims 1 and 7 to more clearly recite the use of gamma correction.

More particularly, claims 1 and 7 now recite "... an image signal receiving means for receiving a color image signal; a gamma correction means for performing a gamma correction on the received color image signal; and a chromaticity adjustment means for performing a calculation using signal values of the color image signal on which the gamma correction was performed, so as to adjust the chromaticity of an image to be displayed by the image display apparatus for each of primary colors red, green, and blue, separately."

The amendments to claims 1 and 7 make it clear that claims 1 and 7 each claim an apparatus that performs gamma correction on signal values prior to adjusting chromaticity. The chromaticity

adjustment means performs calculations using signal values of gamma corrected image signal so as to adjust chromaticity. In contrast, the cited references, individually and in combination, fail to teach, suggest, or motivate performing gamma correction on signal values prior to adjusting chromaticity.

The Office Action admits that *Saito* does not teach, suggest, or motivate the use of gamma correction, but attempts to overcome the inadequacy of *Saito* by asserting that it would have been obvious to modify the *Saito* device to include the teaching of *Foley* to be able to rapidly calculate and apply smoothly varying correction signals in the digital domain on a pixel by pixel basis. However, *Saito* is directed to adjustments for each display of a multivision system, not to pixel by pixel adjustments. As such, the Office Action failed to provide an adequate reason for combining the references.

Even if it would have been obvious to combine the references, such a combination would not satisfy the recitations of the rejected claims. In particular, *Foley* teaches gamma correction after color correction, not prior to adjusting chromaticity as claimed (see Column 3, lines 51-52 stating "corrected color components are then gamma corrected" [emphasis added]). As such, the cited references do not teach, suggest, or motivate all the recitations of claims 1 and 7, and claims 1 and 7 are patentable over the cited references. Moreover, claims 2, and 4-6, 8, and 10-11 are patentable at least because of their dependence on either claim 1 or 7.

In regard to claim 5, it should be noted that the application of "inverse gamma correction on the color image signal output from the chromaticity adjustment means" is performed subsequent to an earlier gamma correction. As such, the cited references would have to teach, suggest, or motivate gamma correction both before and after chromaticity adjustment to render claim 5 unpatentable. As the cited references fail to do so, claim 5 is patentable over the cited references.

It is believed that the case is now in condition for allowance, and an early notification of the same is requested. If the Examiner believes that a telephone interview will help further the prosecution of this case, he is respectfully requested to contact the undersigned attorney at the listed telephone number.

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to the Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on April 28, 2005.

By: Rachel Carter

Rachel Carter
Signature

Dated: April 28, 2005

Very truly yours,

SNELL & WILMER L.L.P.

David J. Zoetewey
Registration No. 45,258
1920 Main Street, Suite 1200
Irvine, California 92614-7230
Telephone: (949) 253-4904